

REMARKS

By this Amendment, Claims 1, 2, 23-25, 27, 28, 33-35, and 41 are amended, Claim 19 is canceled, and no new claims are added.

**I. Claim Rejections - 35 U.S.C. §112**

The Examiner has rejected Claims 2 and 19 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

The Examiner rejects Claim 2 stating that:

"The term "small foot" is not defined in the specification and is a relative term."

The Applicants have amended Claim 2 to more clearly recite the invention and believe this "35 U.S.C. 112, second paragraph" rejection of Claim 2 should be withdrawn.

The Examiner rejects Claim 19 stating that:

"The term "another processing gas" is not the same as an inert gas."

The Applicants have canceled Claim 19 making this "35 U.S.C. 112, second paragraph" rejection of Claim 19 moot.

**II. Claim Rejections - 35 U.S.C. §102b**

The Examiner has rejected Claims 1-9, 20-21, 23, 27-29, 31-36, and 41 under 35 U.S.C. 102(b) as being anticipated by M. Angeopoulos et. al. (U. S. Patent: 6316167, here after 167).

The Examiner has rejected claim 1 under 35 U.S.C. 102(b) as being anticipated by 167, asserting that 167 teaches:

"a method for depositing a material on a substrate, comprises, placing a substrate in a chamber having a plasma source and on a substrate holder [column 9 line 65];

depositing a TERA layer on the substrate [column 8 line 58, (SiCH)]. The fact that the processing gas (tetramethylsilane) is not amine-based precursor (as is disclosed in 0046 of application the amine based precursor react with resist), and in fact the

applicant use this precursor [0055 line 11]). Therefore, the precursor chosen to reduce reaction with a photoresist.

The Applicants have amended Claim 1 to more clearly recite the invention and believe this “35 U.S.C. 102(b)” rejection of Claim 1 should be withdrawn because amended Claim 1 is not anticipated by 167.

The Applicants believe that the cited art does not teach, suggest, or motivate a method that comprises:

depositing a Tunable Etch Resistant ARC (TERA) layer on the substrate, wherein the depositing further comprises:

flowing a precursor and an inert gas into the chamber at different flow rates, the chamber being at a first pressure;

establishing a different flow rate for the inert gas and a different chamber pressure;

performing a stabilization process, wherein the flow rate of the precursor, the flow rate of the inert gas, and the chamber pressure are held substantially constant;

depositing a top layer of the TERA layer;

performing a purging process;

performing a discharge sequence, wherein an RF signal is provided during a pin up process; and

performing second purging process, wherein the precursor is chosen to reduce reaction with a photoresist.

The Examiner has rejected Claim 2 stating that: “Since the application is to fabricate IC’s and in nm size, [column 1 lines 1-3, column 1 lines 29-33], therefore the photoresist features should be about nm and are very small ( also please see column 5 lines 10-13).”

The Applicants have amended Claim 2 to more clearly recite the invention and believe this “35 U.S.C. 102(b)” rejection of Claim 2 should be withdrawn because amended Claim 2 is not anticipated by 167.

The Examiner has rejected Claim 3 stating that: “167 teaches forming plurality of photoresist features on the photoresist compatible surface and she further teaches the feature comprises a well defined rectangle profile [fig. 101.]”

The Examiner has rejected Claim 4 stating that: “167 teaches the limitation of claim 1 as discussed above and since she uses the same precursor to form the TERA layer as the applicant uses (tetramethylsilane) [column 8 line 60] underneath the photoresist layer, therefore it is inherent that it matches (reduce chemical reaction) with the resist and prevent formation of footings on the photoresist features [fig. 8 and column 5 lines 10- 13] and the photoresist on the top portion also has rectangular profile [fig. 8].”

The Examiner has rejected Claim 5 stating that: “167 teaches the limitation of claim 1 as discussed above and she further teaches isolating a bottom portion (layer 1) of the TERA layer from the photoresist with a top portion of the TERA layer (layer 3) [fig. 2B], thereby reducing the formation of footing on photoresist features in a photoresist layer [fig. 8, column 5 lines 10-13].”

The Examiner has rejected Claim 6 stating that: “167 teaches the limitation of claim 1 as discussed above and she further teaches providing a chemically inactive layer (TERA layer) between a chemically active layer (the substrate or the silicon dioxide layer) [column 8 line 371] and a photoresist layer [fig. 2B], wherein the precursor is chosen to create a dielectric material (SiCH) [column 8 line s 57-601] that does not chemically react with the photoresist layer.”

The Examiner has rejected Claim 7 stating that: “167 teaches the limitation of claim 1 as discussed above and she further teaches the top portion of the TERA layer have a chemically inert surface [SiCH, column 10 lines 54-56] with plurality of rectangular photoresist features [Fig. 8].”

The Examiner has rejected Claim 8 stating that: “167 teaches the limitation of claim 1 as discussed above and she further teaches there is no chemical interaction and therefore resist poisoning [column 10 lines 45-49] between the TERA layer [column 10 lines 54-56] and plurality of photoresist features having substantially rectangular profiles can be formed on the TERA layer [fig. 8].”

The Examiner has rejected Claim 9 stating that: "167 teaches the limitation; of claim 1 as discussed above and it further teaches, a method of depositing material on a substrate wherein the depositing TERA layer during a depositing time comprises a material having a refractive index (n) of 2.1 and extinction coefficient of 0.5 [column 12 line 58-59, first layer] measured at the wavelength of 248 nm [column 12 lines 30 and 64]."

The Examiner has rejected Claim 31 stating that: "167 teach the limitation of claim 27 and she further teaches the inert gas to be argon [column 9 line 211]."

The Examiner has rejected Claims 20 and 21 are rejected. 167 teaches the limitation of claim 9 and 167 teaches controlling the pressure of the chamber and the pressure in the range of 0.2 torr [column 8 line 61]."

The Examiner has rejected Claim 23 stating that: "167 teaches limitation of claim 1 and she further teaches depositing a top portion of the TERA layer, wherein the top portion comprises a material having a refractive index of 1.9 and extinction coefficient of 0.25, when measured at a wavelength of 248 nm [column 12 line 61]."

The Applicants have amended Claim 23 to more clearly recite the invention and believe this "35 U.S.C. 102(b)" rejection of Claim 23 should be withdrawn because amended Claim 23 is not anticipated by 167.

The Examiner has rejected Claims 27 and 28 stating that: "167 teaches limitation of claim 23 and she further teaches he process gas comprises silicon, carbon, oxygen and argon containing gas [column 9 line 21]."

The Applicants have amended Claim 27 to more clearly recite the invention and believe this "35 U.S.C. 102(b)" rejection of Claim 27 should be withdrawn because amended Claim 27 is not anticipated by 167.

The Examiner has rejected Claim 29 stating that: "167 teaches the limitation of claim 27 as discussed above and she further teaches the precursor flowed with the rate of 10 sccm [column 8 line 59] and the inert flowed with the rate of 30sccm [column 9 line 22]."

The Examiner has rejected Claim 32 stating that: "167 teaches the limitation of claim 28 as discussed above and she further teaches the processing gas comprises tetramethylsilane (4MS) [column 8 line 60]."

The Examiner has rejected Claim 33 stating that: “167 teaches the limitation of claim 32 and she further teaches controlling the chamber pressure to be lower than 3 torr [column 8 line 58].”

The Applicants have amended Claim 33 to more clearly recite the invention and believe this “35 U.S.C. 102(b)” rejection of Claim 33 should be withdrawn because amended Claim 33 is not anticipated by 167.

The Examiner has rejected Claims 34-35 stating that: ‘167 teaches the limitation of claim 32 and 33 and she further teaches depositing the TERA layer (top portion) comprises controlling the temperature of the substrate to greater than 300 C [column 10 lines 1-2].

The Applicants have amended Claims 34-35 to more clearly recite the invention and believe this “35 U.S.C. 102(b)” rejection of Claims 34-35 should be withdrawn because amended Claims 34-35 are not anticipated by 167.

The Examiner has rejected Claim 36 stating that: “167 teaches the limitation of claim 1 and she further teaches controlling the substrate temperature at 60 °C [column 8 line 62].

In addition, the Applicants have amended Claim 1 to more clearly recite the invention and believe the “35 U.S.C. 102(b)” rejections of Claims 2-9, 20-21, 23, 27-29, 31-36, 41 should be withdrawn because Claims 2-9, 20-21, 23, 27-29, 31-36, 41 are dependent from amended Claim 1, and the Applicants believe that amended Claim 1 is not anticipated by 167.

The Examiner has rejected Claim 41 stating that: “167 teaches a method for depositing a material on a substrate, the method comprising:

Placing a substrate in a chamber having plasma source and on a substrate holder [column 9 line 65];

Depositing (tunable) layers of materials on the surface [fig. 2B]. Depositing a first portion of a TERA layer on the substrate, wherein a first processing gas comprising first precursor is provided to the chamber (the deposition is via PECVD, therefore it is inside a chamber) [column 9 lines 65-68] and depositing a second processing gas comprising a second precursor is provided to the chamber, wherein the second precursor

is chosen to reduce reaction with a photoresist [column 10 lines 7-9, column 10 lines 53-57].”

The Applicants have amended Claim 41 to more clearly recite the invention and believe this “35 U.S.C. 102(b)” rejection of Claim 41 should be withdrawn because amended Claim 41 is not anticipated by 167.

The Applicants believe that the cited art does not teach, suggest, or motivate a method that comprises:

“A method for depositing a material on a substrate, the method comprising: placing a substrate in a chamber having a plasma source and on a substrate holder; depositing a first portion of a Tunable Etch Resistant ARC (TERA) layer on the substrate, wherein a first processing gas comprising a first precursor is provided to the chamber; and

depositing a second portion of the TERA layer on the first portion of the TERA layer, wherein a second processing gas comprising a second precursor is provided to the chamber, wherein the second precursor is chosen to reduce reaction with a photoresist; and

performing a pin up process, wherein a RF signal is provided during at least a portion of the pin up process.”

### III. Claim Rejections - 35 U.S.C. §103a

The Examiner has rejected Claims 15-17 and 19 under 35 U.S.C. 103(a) as being unpatentable over M. Angeopoulos et. al. (U. S. Patent: 6316167, here after 167).

The Applicants have amended Claim 1 to more clearly recite the invention and believe this “35 U.S.C. 103(a)” rejection of Claims 15-17 and 19 should be withdrawn because Claims 15-17 and 19 are dependent from amended Claim 1, and the Applicants believe that amended Claim 1 is patentable over 167.

The Examiner has rejected Claims 15 and 17 stating that: “167 teaches the limitation of claim 9 and she further teaches another process gas comprises silicon and carbon containing precursor (trimethylsilane, 3MS) [column 9 line 6]. Since 167 teaches depositing top and bottom part of TERA layer, the precursor can be chose independent

from each other. Therefore it would have been obvious to one of ordinary skill in the art at the time of invention was made to have a method of deposition of TERA layer where the bottom part is depositing by tetramethylsilane precursor and the top portion is deposited by trimethylsilane precursor, because 167 teaches it is suitable to deposit the TERA layer with these precursors.”

The Examiner has rejected Claim 16 stating that: “167 teaches the limitation of claim 15 and she further teaches silicon containing and carbon containing precursor with the rate of 10 sccm [column 8 line 60].

The Examiner has rejected Claim 19 stating that: “167 teach the limitation of claims 15 and she further teaches the inert gas to be argon [column 9 line 21].

The Applicants have canceled Claim 19 rendering the rejection of Claim 19 moot.

The Examiner has rejected Claims 10-12, 18 and 25-26 under 35 U.S.C. 103(a) as being unpatentable over M. Angeopoulos et. al. (U. S. Patent: 6316167, here after 167) further in view of Houngh T. Nguyen et. al. (U. S. Patent application: 2003/0017694, here after 694).

The Applicants have amended Claim 1 to more clearly recite the invention and believe the “35 U.S.C. 103(a)” rejections of Claims 10-12, 18, and 25-26 should be withdrawn because Claims 10-12, 18, and 25-26 are dependent from amended Claim 1, and the Applicants believe that amended Claim 1 is patentable over 167 and 694.

The Examiner has rejected Claim 11 stating that: “167 teaches the limitation of claim 1 as discussed above, 'she teaches a method of deposition a TERA layer (comprises Si, C, O, H) [column 4 lines 12-24] on a substrate. 167 does not specifically teach the deposit rate of the bottom portion of the TERA layer is about 100-10000 A/min. 694 teaches a method of deposition of organosilicate layers [abstract lines 1-2] wherein the deposit rate of the organosilicate material is in the range of 1000-20000 A/min [0055 lines 12-14]. Therefore it would have been obvious to one of ordinary skill in the art at the time of invention was made to have a method of deposition of TERA layer in which the deposition rate of the TERA layer is 100- 10000 A/ min, because 694 teaches it is suitable to deposit TERA layer with these deposition rate.”

The Examiner has rejected Claims 10 and 12 stating that: “167 teaches a method of deposition a TERA layer (comprises Si, C, O, H) [column 4 lines 12-24] on a substrate. 167 does not specifically teach the deposition time for depositing the bottom layer is between 5-18 seconds. 694 teaches a method of deposition of organosilicate layers [abstract lines 1-2] wherein the deposit rate of the organosilicate material is 20000 A/ min [0055 lines 12- 14]. He further teaches the thickness of the layer is about 3000 A [0057 lines 4]. Therefore it would have been obvious to one of ordinary skill in the art at the time of invention was made to have a method of deposition of TERA layer in which the deposition time of the bottom TERA layer is about 9 sec, because 694 teaches within this time the thickness of the TERA layer is appropriate.”

The Examiner has rejected Claim 18 stating that: “167 teaches the limitation of claim 15 as discussed above and she further teaches a method of deposition a TERA layer (comprises Si, C, O, H) [column 4 lines 12-24] on a substrate which meets the limitation of claim 15 as discussed above. 167 does not specifically teach the processing gas comprises CH<sub>4</sub>. 694 teaches a method of deposition of organosilicate layers [abstract lines 1-21 wherein the processing gas comprises CH<sub>4</sub> [O053 line 3]. Therefore it would have been obvious to one of ordinary skill in the art at the time of invention was made to have a method of deposition of TERA layer in which the processing gas comprises CH<sub>4</sub>, because 694 teaches methane is a suitable gas for deposition of organosilicate layer.

The Examiner has rejected Claim 25 stating that: “Claim 25 is rejected for the same reason claim 11 is rejected [also see 0064 lines 2-5].”

The Examiner has rejected Claim 26 stating that: “Claim 26 is rejected for the same reason claim 12 is rejected [also see 0064 lines 2-5].”

The Examiner has rejected Claims 13-14 and 24 under 35 U.S.C. 103(a) as being unpatentable over M. Angeopoulos et. al. (U. S. Patent: 63 16167, here after 167) further in view of Seon Mee Cho et. al. (U. S. Patent Application: 200310003768, here after Cho).

The Applicants have amended Claim 1 to more clearly recite the invention and believe this “35 U.S.C. 103(a)” rejection of Claims 13-14 and 24 should be withdrawn

because Claims 13-14, and 24 are dependent from amended Claim 1, and the Applicants believe that amended Claim 1 is patentable over 167 and Cho.

The Examiner has rejected Claim 13 and 24 stating that: “167 teaches the limitation of claims 1 and 23 as discussed above and she further teaches a method of deposition a TERA layer (comprises Si, C, O, H) [column 4 lines 12-24] on a substrate which meets the limitation of claims 1, 10 and 24 as discussed above. 167 does not specifically teach the plasma source has a RF source. Cho teaches a method of deposition of organosilicate layers [0016 lines 1-41 wherein the plasma source (11) has a RF source in a power range of 10 watt/ cm<sup>2</sup> to about 200 watt/ cm<sup>2</sup> [0038, lines 3-5] frequency of 13.56 MHz [0037 lines 5-6 and 11 – 15]. Therefore it would have been obvious to one of ordinary skill in the art at the time of invention was made to have a method of deposition of TEFL4 layer in which the plasma source has a RF has the power of 1 watt/ cm<sup>2</sup> to about 500 watt/ cm<sup>2</sup>, 13.56 MHz frequency, because Cho teaches it is suitable to deposit TERA layer with having RF plasma source.”

The Examiner has rejected Claim 14 stating that: “167 teaches the imitation of claim 13 as discussed above and she further teaches a method of deposition a TERA layer (comprises Si, C, O, H) [column 4 lines 12-24] on a substrate which meets the limitation of claims 1 and 10 as discussed above. 167 does not specifically teach the substrate holder is coupled to a RF source. Cho teaches a method of deposition of organosilicate layers [0016 lines 1-4] wherein the substrate holder (12) [0035 lines 11-13] is coupled to a second RF source [00033 lines 8-23] of 0.3-3.2 watt/ cm<sup>2</sup> [0035 lines 12-13] and frequency of 0.1-200 MHz [0033 lines 16-17]. Therefore it would have been obvious to one of ordinary skill in the art at the time of invention was made to have a method of deposition of TEFL4 layer in which the plasma source has a RF has the power of 0.3-3.2 watt/cm<sup>2</sup> and frequency of 0.1-200 MHz, because Cho teaches it is suitable to deposit TERA layer with having RF plasma source.”

The Examiner has rejected Claim 30 is rejected under 3 5 U.S.C. 1 03(a) as being unpatentable over M. Angeopoulos et. al. ( U. S. Patent: 6316167, here after 167), further in view of A. Grill, Journal of Applied Physics, Vol. 93 (2003) 1785-1790, here after Grill.

The Applicants have amended Claim 1 to more clearly recite the invention and believe this “35 U.S.C. 103(a)” rejection of Claim 30 should be withdrawn because Claim 30 is dependent from amended Claim 1, and the Applicants believe that amended Claim 1 is patentable over 167 and Grill.

The Examiner states that: “167 teaches limitation of claim 27, as discussed in the 35 U.S.C. 102(b) rejection above. 167 does not teach the precursor comprises TMCTS. Grill teaches a method for depositing SiCOH by PECVD when the precursor is TMCTS [column 2 line 4 and 27, page 17851 (mixing with inert gas (column 1 line 6 page 1786). Therefore, it would have been obvious to one of ordinary skill in the art at the time of invention was made to have a method for depositing SiCOH film via PECVD that 167 teaches when the precursor is TMCTS, because Grill teaches it is suitable to use TMCTS for depositing SiCOH film via PECVD process.”

The Examiner has rejected Claim 22 under 35 U.S.C. 103(a) as being unpatentable over M. Angeopoulos et. al. (U. S. Patent: 6316167, here after 167) further in view of Craig A. Roderick (U. S. Patent: 6074488, here after 488). The Examiner states that “167 teaches the limitation of claim 9 as discussed in the 35 U.S.C. 102(b) rejection above. 167 does not teach the DC voltage is applied to an electrostatic chuck. 488 teaches a method of plasma deposition [column 10 lines 42-46] where a DC voltage applied to the electrostatic chuck [column 2 lines 58-60]. He further teaches the DC voltage is about 200-2000 Volts [claim 32]. Therefore it would have been obvious to one of ordinary skill in the art at the time of invention was made to have a method of plasma deposition wherein the DC voltage to an electrostatic chuck of about 200-2000 Volts to hold the substrate and generate plasma, because 488 teaches it is desirable to deposit material on a surface by such a plasma processing to eliminate extraneous components [column 2, lines 55-65].”

The Applicants have amended Claim 1 to more clearly recite the invention and believe this “35 U.S.C. 103(a)” rejection of Claim 22 should be withdrawn because Claim 22 is dependent from amended Claim 1, and the Applicants believe that amended Claim 1 is patentable over 167 and 488.

The Examiner has rejected Claims 37-38 under 35 U.S.C. 103(a) as being unpatentable over M. Angeopoulos et. al. (U. S. Patent: 6316167, here after 167) further in view of Tac K. Won (U. S. Patent Application: 2003/0044621, here after Won).

The Applicants have amended Claim 1 to more clearly recite the invention and believe this “35 U.S.C. 103(a)” rejection of Claims 37-38 should be withdrawn because Claims 37-38 are dependent from amended Claim 1, and the Applicants believe that amended Claim 1 is patentable over 167 and Won.

The Examiner states “167 teaches a method of deposition a TERA layer (comprises Si, C, O, H) [column 4 lines 12-24] on a substrate which meets the limitation of claim 1, as discussed in the 35 U.S.C. 102(b) rejection above, 167 does not teach controlling the chamber wall temperature. Won teaches a method of deposition of organosilicate layers [abstract lines 7-91 wherein where the chamber wall temperature is controlled [005 1 lines 1 to the end] in order to obtain uniform film [claim 2 lines 7-10], he further teaches the temperature is between 380-410 °C [claim 2 line 9-10]. Therefore it would have been obvious to one of ordinary skill in the art at the time of invention was made to have a method of deposition of TERA layer in which chamber wall temperature is controlled and is between 380-410 C, because Won teaches the deposited film will be uniform with controlling the chamber temperature between 380-410 C.”

The Examiner has rejected Claim 39 under 35 U.S.C. 103(a) as being unpatentable over M. Angeopoulos et. al. (U. S. Patent: 6316167, here after 167) further in view of Zheng Yuan ( U. S. Application: 200210163028, here after Yuan). The Examiner states: “167 teaches the limitation of claim 1, as discussed in the 35 U.S.C. 102(b) rejection above. She further teaches a shower head assembly is coupled to the chamber [120 fig. 2 and 0027 lines 3-5]. She does not specifically teaches the temperature of the showerhead. Yuan teaches a method for depositing film on a substrate [abstract lines 1-2, 0007 lines 1-4], where the temperature of showerhead is about 90- 120 C [0040 lines 3-12], to enhance the reaction time between the species. Therefore it would have been obvious to one of ordinary skill in the art at the time of invention was made to have a method of deposition of TERA layer in which the showerhead temperature is controlled and is between 90-120 C, because Yuan teaches it enhance the reaction time between the species.”

The Applicants have amended Claim 1 to more clearly recite the invention and believe this “35 U.S.C. 103(a)” rejection of Claim 39 should be withdrawn because Claim 39 is dependent from amended Claim 1, and the Applicants believe that amended Claim 1 is patentable over 167 and Yuan.

The Examiner has rejected Claim 40 under 35 U.S.C. 103(a) as being unpatentable over M. Angeopoulos et. al. (U. S. Patent: 6316167, here after 167) and Enzo Carollo (U. S. Patent Application: 2004/0137169, here after Carollo) as applied to claim 38 above, further in view of Zheng Yuan (U. S. Application: 2002/0163028, here after Yuan).

The Applicants have amended Claim 1 to more clearly recite the invention and believe this “35 U.S.C. 103(a)” rejection of Claim 40 should be withdrawn because Claim 40 is dependent from amended Claim 1, and the Applicants believe that amended Claim 1 is patentable over 167 in view of Carollo and Yuan.

The Examiner states: “167 and Carollo teach the limitation of claim 38, as discussed above. 167 further teaches a shower head assembly is coupled to the chamber [120 fig. 2 and 0027 lines 3-5], 167 does not specifically teaches the temperature of the showerhead. Yuan teaches a method for depositing film on a substrate [abstract lines.1-2, 0007 lines 1-4], where the temperature of showerhead is about 90-120 C [0040 lines 3-12], to enhance the reaction time between the species. Therefore it would have been obvious to one of ordinary skill in the art at the time of invention was made to have a method of deposition of TERA layer in which the showerhead temperature is controlled and is between 90-120 C, because Yuan teaches it enhance the reaction time between the species.”

The Applicants believe that the Examiner’s “35 U.S.C. 103(a)” rejections are based on improper hindsight reasoning and are improper because the Examiner is using “knowledge gleaned only from applicant’s disclosure” to make the rejections. In re McLaughlin 443 F.2d 1392, 1395, 170 USPQ 209, 212 (CCPA 1971).

Each of the Examiner’s rejections having been addressed, the Applicants respectfully submit that Claims 1-18 and 20-41 are now in a condition for allowance. Given the above remarks, independent claims 1, and 41 as amended, are now in condition for allowance. The dependent claims 2-18 and 20-40, as amended, are

similarly in condition for allowance as they incorporate limitations from independent claim 1. In light of the comments above, the Applicant respectfully requests the allowance of claims 1-18 and claims 20-41.

If the undersigned agent has overlooked a teaching in any of the cited references that is relevant to the Allowability of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact the undersigned agent at 480-539-2105 or by email at [jim.klekotka@us.tel.com](mailto:jim.klekotka@us.tel.com).

*Charge Deposit Account*

Please charge our Deposit Account No. 50-3451 for any additional fee(s) that may be due in this matter, and please credit the same deposit account for any overpayment.

Respectfully submitted,

/James Klekotka/

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